

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

Robin Prince, individually and on)
behalf of all others similarly situated,)
Plaintiff,)
v.) No. 1:19-cv-4769
Global Credit & Collection Corp., a) Magistrate Judge Young B. Kim
Delaware limited liability company,)
Defendant.)

**JOINT MOTION FOR PRELIMINARY APPROVAL
OF CLASS ACTION SETTLEMENT AGREEMENT**

Plaintiff, Robin Prince, and Defendant, Global Credit & Collection Corp.

(“Defendant”), submit this Joint Motion, pursuant to Fed. R. Civ. P. 23, for certification of a settlement class and preliminary approval of the Class Action Settlement Agreement.

In support of this motion, the parties state:

1. A Class Action Settlement Agreement, dated December 6, 2019, and attached as Exhibit 1, has been entered into by the parties.
2. The proposed Class Notice is attached as Exhibit 2.
3. The proposed Order Granting Preliminary Approval to the Class Action Settlement Agreement is attached.
4. The parties represent to the Court:
 - A. That the proposed settlement was reached through arms-length negotiations between Plaintiff's Counsel and Defendant's Counsel;
 - B. That the parties believe the proposed settlement is fair, reasonable and adequate to the members of the Class in light of the alleged violation by Defendant of the FDCPA; and,

C. That the Settlement Agreement represents the compromise of disputed claims, that it in no way constitutes an admission of liability by Defendant with respect to any of the material allegations in the Complaint, and that Defendant specifically denies that its actions constitute a violation of the FDCPA to any extent whatsoever.

5. Plaintiff's Counsel represents to this Court that they are able, experienced and well-qualified to evaluate the fairness of the proposed settlement on behalf of the members of the Class and that Counsel are in favor of this Motion. The Declaration of one of Plaintiff's counsel, David J. Philipps, setting forth his experience and qualification is attached as Exhibit 3.

6. Defendant agrees to the certification, pursuant to Fed.R.Civ.P. 23(b)(3), of a settlement class consisting of all persons in the State of Alabama, from whom Defendant attempted to collect a defaulted consumer debt that was allegedly owed for a Credit One/LVNV Funding account, via the same form collection letter that Defendant sent to Plaintiff (Complaint Exhibits B and C), from July 16, 2018 to the present. (the "Class").

7. Defendant also agrees to the appointment of Robin Prince as representative of the Class and the appointment of her attorneys, David J. Philipps, Mary E. Philipps and Angie K. Robertson of Philipps & Philipps, Ltd., and Bradford W. Botes of Bond, Botes, Reese & Shinn, P.C., as Class Counsel.

WHEREFORE, the parties request that this Court certify the settlement Class requested herein, grant preliminary approval to the Class Action Settlement Agreement and enter the attached order.

Dated: February 7, 2020

Plaintiff's Counsel,

/s/ David J. Philipps

David J. Philipps (Ill. Bar No. 06196285)
Philipps & Philipps, Ltd.
9760 S. Roberts Road, Suite One
Palos Hills, Illinois 60465
(708) 974-2900
(708) 974-2907 (FAX)
davephilipps@aol.com

Bradford W. Botes (AL Bar No. ASB-1379043B)
Bond, Botes, Reese & Shinn, P.C.
15 Southlake Lane
Suite 140
Birmingham, Alabama 35244
(205) 802-2200
(205) 870-3698 (FAX)
bbotes@bondnbotes.com

Defendant's Counsel,

/s/ Brian W. Ledebuhr

Brian W. Ledebuhr (Ill. Bar No. 06294417)
Vedder Price, P.C.
222 North LaSalle Street
Suite 2300
Chicago, Illinois 60601
bledebuhr@vedderprice.com

CERTIFICATE OF SERVICE

I hereby certify that on February 7, 2020, a copy of the foregoing **Joint Motion For Preliminary Approval Of Class Action Settlement Agreement** was filed electronically. Notice of this filing will be sent to the following parties by operation of the Court's electronic filing system. Parties may access this filing through the Court's system.

Brian W. Ledebuhr
Vedder Price, P.C.
222 North LaSalle Street
Suite 2300
Chicago, Illinois 60601

bledebuhr@vedderprice.com

Bradford W. Botes
Bond, Botes, Reese & Shinn, P.C.
15 Southlake Lane
Suite 140
Birmingham, Alabama 35244

bbotes@bondnbotes.com

/s/David J. Philipps
David J. Philipps
Philipps & Philipps, Ltd.
9760 S. Roberts Road
Suite One
Palos Hills, Illinois 60465
davephilipps@aol.com